

REMARKSClaim Rejections – 35 U.S.C. §112

Claim 13 stands rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. Claim 13 has been canceled.

Withdrawal and reconsideration of this rejection is respectfully requested.

Claim Rejections – 35 U.S.C. §102

Claims 1-5, 11 and 12 stand rejected under 35 U.S.C. §102(e) as being anticipated by Robotham et al. (US 6,704,024).

Directing Examiner's attention to MPEP 2131, the threshold issue under Section 102 is whether the Examiner has established a *prima facie* case for anticipation. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ 2d 1051, 1053 (Fed. Cir. 1987)". "The identical invention must be shown in as complete detail as is contained in the ...claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1566 (Fed. Cir. 1989).

Amended Claim 1 recites a system, comprising "a computing resource accessible to a plurality of clients via a communication network; a storage service operating on the computing resource configured to store unrendered image data corresponding to scenes, said unrendered image data comprising a raw image data representation of a scene as obtained by a camera's sensor system"

Robotham does not disclose unrendered image data comprising a raw image data representation of a scene as obtained by the sensor system of a camera. Robotham fails to mention a camera at all, let alone data obtained by the sensor system of a camera.

Robotham is only directed towards “a remote multi-level browsing system for displaying Web pages, e-mail, e-mail attachments, electronic document and forms, database queries and results, is drawings, presentations, and images at the client device.” (Col. 3, lines 10-15).

Examiner cites Col. 4, lines 17-18 as evidence of Robotham teaching the rendering of source data. However, Robotham merely provides a generalized description of this “source” data, explaining that it “requires some type of interpretation or conversion to generate a raster representation.” (Col. 4, lines 17-19). This description fails to provide any information regarding the specific form of the data, let alone that it was obtained by the sensor system of a camera. It merely describes the data as requiring *some type* of interpretation or conversion in preparation of its display on a display device.

Applicant respectfully submits that Robotham fails to teach each and every element of Claim 1 of the present invention. Therefore, Applicant respectfully submits that Claim 1 is currently in condition for allowance.

Claim 2 has been canceled and its limitations have been included in Claim 1.

Since Claims 3-5, 11, and 12 are dependent from Claim 1, they are also patentable as they contain the same limitations as Claim 1. Therefore, Applicant respectfully submits that Claims 3-5, 11, and 12 are currently in condition for allowance.

Reconsideration and withdrawal of these rejections is respectfully requested.

Claim Rejections – 35 U.S.C. §103

Claims 6, 7, 9, 10, and 13 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Robotham and Uda et al. (US 6,515,758).

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Since Claims 6, 7, 9, 10, and 13 depend from Claim 1, they are also patentable as they contain the same limitations as Claim 1. Therefore, Applicant respectfully submits that Claims 6, 7, 9, 10, and 13 are currently in condition for allowance.

Reconsideration and withdrawal of the rejection is respectfully requested.

Claim 8 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Robotham and Uda, in view of Erhard et al. (US 5,806,420).

Since Claim 8 depends from Claim 1, it is also patentable as it contains the same limitations as Claim 1. Therefore, Applicant respectfully submits that Claim 8 is currently in condition for allowance.

Reconsideration and withdrawal of the rejection is respectfully requested.

If the Examiner has any questions regarding this application or this response, the Examiner is requested to telephone the undersigned at 775-586-9500.

Respectfully submitted,
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